

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Edward Jason Dennis (Texas Bar No. 2405776) jdennis@lynnllp.com Samuel B. Hardy IV (Texas Bar No. 24074360) shardy@lynnllp.com Eli Ness (State Bar No. 311054) eness@lynnllp.com Lynn Pinker Hurst & Schwegmann, LLP 2100 Ross Avenue, Suite 2700 Dallas, TX 75201 T: 214.981.3800 F: 214.981.3839 <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Corporate Recovery Associates, LLC	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - NORTHERN DIVISION	
In re: Channel Technologies Group, LLC <div style="text-align: right;">Debtor(s).</div>	CASE NO.: 9:16-bk-11912-DS ADVERSARY NO.: 9:18-ap-01058-DS CHAPTER: 11
Corporate Recovery Associates, LLC <div style="text-align: right;">Plaintiff(s).</div> <div style="text-align: center;">vs.</div> Blue Wolf Capital Partners, LLC, et. al. <div style="text-align: right;">Defendant(s).</div>	<div style="text-align: center;"> JOINT STATUS REPORT [LBR 7016-1(a)(2)] </div> <div style="margin-top: 10px;"> DATE: 8/25/2020 TIME: 11:30 a.m. COURTROOM: 201 ADDRESS: 1415 State Street, Santa Barbara, California 93101 </div>

The parties submit the following JOINT STATUS REPORT in accordance with LBR 7016-1(a)(2):

A. PLEADINGS/SERVICE:

- | | | |
|---|---|-----------------------------|
| 1. Have all parties been served with the complaint/counterclaim/cross-claim, etc. (Claims Documents)? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2. Have all parties filed and served answers to the Claims Documents? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 3. Have all motions addressed to the Claims Documents been resolved? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 4. Have counsel met and conferred in compliance with LBR 7026-1? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

5. If your answer to any of the four preceding questions is anything other than an unqualified "YES," please explain below (*or on attached page*):

B. READINESS FOR TRIAL:

1. When will you be ready for trial in this case?

Plaintiff

Plaintiff believes that it will be ready by March 2021.

Defendant

Defendant believes that it will be ready by December 2021.

2. If your answer to the above is more than 4 months after the summons issued in this case, give reasons for further delay.

Plaintiff

There were two rounds of motion to dismiss briefing, and there has been a 4 month Covid delay.

Defendant

There are numerous witnesses located across the country who must be deposed which is complicated by the pandemic. Plaintiff has produced over 30 million pages of documents and there will be discovery disputes pertaining to same.

3. When do you expect to complete your discovery efforts?

Plaintiff

By January 2020

Defendant

By September 2021

4. What additional discovery do you require to prepare for trial?

Plaintiff

The Plaintiff does not anticipate having to conduct much third-party discovery.

Defendant

It is anticipated that there will be interrogatories, document requests, depositions, and requests for admissions.

C. TRIAL TIME:

1. What is your estimate of the time required to present your side of the case at trial (*including rebuttal stage if applicable*)?

Plaintiff

The Plaintiff can present its side in 2 weeks.

Defendant

The Defendant can present its side in 2 weeks.

2. How many witnesses do you intend to call at trial (*including opposing parties*)?

Plaintiff

The Plaintiff anticipates calling 10-12 witnesses.

Defendant

The Defendant does not yet know how many witnesses it intends to call at trial.

3. How many exhibits do you anticipate using at trial?

Plaintiff

Plaintiff anticipates using approximately 100 exhibits.

Defendant

Defendant does not yet know how many exhibits it anticipates using at trial

D. PRETRIAL CONFERENCE:

A pretrial conference is usually conducted between a week to a month before trial, at which time a pretrial order will be signed by the court. [See LBR 7016-1.] If you believe that a pre-trial conference is not necessary or appropriate in this case, please so note below, stating your reasons:

Plaintiff

Pretrial conference ☒ is ☐ is not requested
Reasons:

Defendant

Pretrial conference ☒ is ☐ is not requested
Reasons:

Plaintiff

Pretrial conference should be set after:
(date) 2/28/21

Defendant

Pretrial conference should be set after:
(date) 10/2021

E. SETTLEMENT:

1. What is the status of settlement efforts?

Mediation had been scheduled for April 22 with Michelle Yoshida. Due to the closures and travel challenges, the mediation was cancelled. The Blue Wolf parties have not been able to reschedule the principal mediation since then due to issues with their insurance carrier. Plaintiff has successfully entered into talks with other defendants.

2. Has this dispute been formally mediated? ☒ Yes ☐ No

If so, when?

Plaintiffs have engaged with several other defendants in settlement conferences, discussions and mediation that have resulted in the dismissals of five Defendants since the last status conference.

3. Do you want this matter sent to mediation at this time?

Plaintiff

☒ Yes ☐ No

Defendant

☒ Yes ☐ No

F. FINAL JUDGMENT/ORDER:

Any party who contests the bankruptcy court's authority to enter a final judgment and/or order in this adversary proceeding must raise its objection below. Failure to select either box below may be deemed consent.

Plaintiff

☒ I do consent

☐ I do not consent

to the bankruptcy court's entry of a final judgment
and/or order in this adversary proceeding.

Defendant

☐ I do consent

☒ I do not consent

to the bankruptcy court's entry of a final judgment
and/or order in this adversary proceeding.

G. ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL: (Use additional page if necessary)

Defendants intend to move for summary judgment and/or summary adjudication of issues.


Respectfully submitted,

Date: 8/20/2020

Greenberg Taurig, LLP
Printed name of law firm

/s/ Howard Steinberg
Signature

Howard Steinberg
Printed name

Attorney for: Defendant 


BW Piezo Holdings, LLC; Blue Wolf Capital Fund II, LP;
Blue Wolf Capital Advisors, LP; Blue Wolf Capital
Partners, LLC

Date: 8/20/2020

Lynn Pinker Hurst & Schwegmann, LLP
Printed name of law firm

/s/ Edward Jason Dennis
Signature

Edward Jason Dennis
Printed name

Attorney for: Plaintiff 

Corporate Recovery Associates, LLC

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to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

Defendant

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to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

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Defendants intend to move for summary judgment and/or summary adjudication of issues.

Respectfully submitted,

Date: _____

Printed name of law firm

Signature

Printed name

Attorney for: _____

Date: 8-20-2020

Barnes & Thornburg LLP

Printed name of law firm

Signature

Jonathan J. Boustani

Printed name

Attorney for: CTS Corporation; CTG Advanced Materials, LLC

F. FINAL JUDGMENT/ORDER:

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to the bankruptcy court's entry of a final judgment
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to the bankruptcy court's entry of a final judgment
and/or order in this adversary proceeding.

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Defendants intend to move for summary judgment and/or summary adjudication of issues.

Respectfully submitted,

Date: _____

Printed name of law firm

Signature

Printed name

Attorney for: _____

Date: 8/20/2020

Blank Rome LLP

Printed name of law firm

/s/ Craig N. Haring

Signature

Craig N. Haring

Printed name

Attorney for: Def. Gladstone Investment Corporation

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
2100 Ross Avenue, Suite 2700, Dallas, Texas 75201

A true and correct copy of the foregoing document entitled: **JOINT STATUS REPORT [LBR 7016-1(a)(2)]** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* 8/20/2020, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On *(date)* _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

8/20/2020
Date

Edward Jason Dennis
Printed Name

/s/ Edward Jason Dennis
Signature

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

SERVICE LIST

**United States Bankruptcy Court – Central District of California
Northern Division**

Case No. 9:18-AP-01058-DS

Our File No. 03349.801

Served By The Court Via Notice Of Electronic Filing (“NEF”)

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pjbenven74@yahoo.com
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- **United States Trustee (ND)** ustpreion16.nd.ecf@usdoj.gov
- **Douglas R. Gooding** dgooding@choate.com
- **Jonathan D. Marshall** jmarshall@choate.com
- **Michelle Yoshida** MYoshida@phillipsadr.com